

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA, *ex rel.*  
ALEX DOE, Relator, THE STATE OF  
TEXAS, *ex rel.* ALEX DOE, Relator, THE  
STATE OF LOUISIANA, *ex rel.* ALEX DOE,  
Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD FEDERATION  
OF AMERICA, INC., PLANNED  
PARENTHOOD GULF COAST, INC.,  
PLANNED PARENTHOOD OF GREATER  
TEXAS, INC., PLANNED PARENTHOOD  
SOUTH TEXAS, INC., PLANNED  
PARENTHOOD CAMERON COUNTY,  
INC., PLANNED PARENTHOOD SAN  
ANTONIO, INC.,

Defendants.

No. 2:21-cv-022-Z

**REPLY IN SUPPORT OF**  
**AFFILIATE DEFENDANTS' MOTION TO STAY PENDING PPFA'S APPEAL**

The parties agree that proceeding with a trial on Plaintiffs' claims against Affiliate Defendants separately from a trial on their claims against PPFA would be inefficient and a waste of the Court's and the parties' resources. *See* ECF No. 572; ECF No. 589 at 1 (If "the Court . . . grants a stay as to PPFA . . . , the Court should also grant a stay as to the Affiliate Defendants."). Therefore, if a stay of the proceedings is granted as to PPFA during the pendency of PPFA's appeal on attorney immunity, Affiliate Defendants respectfully request that the Court grant their motion and stay the proceedings as to Affiliate Defendants as well.

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By: /s/ Tirzah S. Lollar

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Texas, Inc., Planned Parenthood South Texas, Inc.,  
Planned Parenthood Cameron County, and  
Planned Parenthood San Antonio*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 29, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all participating counsel of record.

/s/ Tirzah S. Lollar